

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

Criminal No. 15-cr-20351

Honorable Victoria A. Roberts

D-1 SHAHID TAHIR,
D-2 WASEEM ALAM, M.D.,
D-3 HATEM ATAYA, M.D.,
D-4 MANAWAR JAVED,
D-5 MUHAMMAD TARIQ,

Defendants.

/

FORFEITURE BILL OF PARTICULARS

NOW COMES the United States of America, by and through its counsel,
BARBARA L. McQUADE, United States Attorney and JULIE A. BECK,
Assistant United States Attorney, and submits this Forfeiture Bill of Particulars
pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to provide notice
of specific property which the Government intends to forfeit.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28,
United States Code, Section 2461, and/or 18 U.S.C. § 982(a)(7), the Defendants'
interest in the following property shall be forfeited upon conviction of any, some,
or all of the counts charged in Counts One through Five of the Indictment:

- Five Hundred Eighty-Seven Thousand Seven Hundred Eighty-Six Dollars and Twenty-Eight Cents in United States Currency (\$587,786.28) from Talmer Bank and Trust, account number XXXXX3211;
- Four Thousand One Hundred Fifty-four Dollars and Eighteen Cents in United States Currency (\$4,154.18) from Talmer Bank and Trust, account number XXXXX1391;
- One Hundred Twenty-Six Thousand Eight Hundred Twenty-Seven Dollars and Thirty-Three Cents in United States Currency (\$126,827.33) from Talmer Bank and Trust, account number XXXXX2742;
- Eighty-Four Thousand Eight Hundred Eighty-Nine Dollars and Fifty-Nine Cents in United States Currency (\$84,889.59) from Scholar's Edge 529, account number XXXXX1079;
- Ninety-Four Thousand Seven Hundred Forty-Eight Dollars and Thirty-Five Cents in United States Currency (\$94,748.35) from Scholar's Edge 529, account number XXXXX1075;
- One Hundred Thirty-Three Thousand Three Hundred Twenty-Six Dollars in United States Currency (\$133,326.00) from Huntington Bank and Trust, account number XXXXX0339;

- Seventy Thousand Seven Hundred Forty-Six Dollars and Ninety-Two Cents in United States Currency (\$70,746.92) from JP Morgan Chase Bank, account number XXXXX1351;
- One Hundred Sixty-Six Thousand Nine Hundred Eighty-Nine Dollars and Eighty-Two Cents in United States Currency (\$166,989.82) from AXA Equitable Investment, account number XXXXX6015;
- Sixty-Three Thousand Six Hundred Twenty-Five Dollars and Ninety Cents in United States Currency (\$63,625.90) from PNC Bank, account number XXXXX6742;
- Four Thousand Seven Hundred Eighty-Nine Dollars and Fifty-Seven Cents in United States Currency (\$4,789.57) from Huntington Bank, account number XXXXX3084;
- Eighty Thousand Five Hundred Sixty-Seven Dollars and One Cent in United States Currency (\$80,567.01) from Comerica Bank, account number XXXXX5888;
- Three Thousand Four Hundred Eighteen Dollars and Ninety-Nine Cents in United States Currency (\$3,418.99) from Comerica Bank, account number XXXXX5752;

- Sixteen Thousand Six Hundred Thirty-Five Dollars and Twenty-Six Cents in United States Currency (\$16,635.26) from Level One Bank, account number XXXXX2082;
- Eight Thousand One Hundred Ninety-Four Dollars and Sixty-One Cents in United States Currency (\$8,194.61) from Huntington Bank, account number XXXXX3291;
- Three Thousand Two Hundred Seventy-Five Dollars and Thirteen Cents in United States Currency (\$3,275.13) from Bank of America, account number XXXXX9241;
- Eighty-Six Thousand Thirteen Dollars and Fifty-One Cents in United States Currency (\$86,013.51) from Huntington Bank, account number XXXXX4618;
- One Hundred Twenty-Two Thousand Six Hundred Thirty-Two Dollars and Seventy-Five Cents in United States Currency (\$122,632.75) from PNC Bank, account number XXXXX5504;
- Forty-Nine Thousand Four Hundred Seventy-One Dollars and Forty-Eight Cents in United States Currency (\$49,471.48) from Talmer Bank and Trust, account number XXXXX4242;

- Sixty-Seven Thousand Three Hundred Thirty-One Dollars and Fourteen Cents in United States Currency (\$67,331.14) from Charter One Bank, account number XXXXX3285;
- Eighty-Two Thousand Seven Hundred Eighty-One Dollars and Eighty-Nine Cents in United States Currency (\$82,781.89) from Comerica Bank, account number XXXXX3172; and
- Twenty-Five Thousand Five Hundred Twenty-Two Dollars and Sixty-Eight Cents in United States Currency (\$25,522.68) from Comerica Bank, account number XXXXX2391.

Notice of the government's intent to forfeit assets in this case includes, but is not limited to, the assets listed above. This Bill of Particulars is likewise submitted for the government to comply with the provisions of 18 U.S.C. § 983(a)(3)(B) and reserves its right to file a civil forfeiture complaint in the future.

Respectfully submitted,

BARBARA L. McQUADE
United States Attorney

s/Julie A. Beck
Julie A. Beck (P53291)
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Dated: October 9, 2015

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2015, the foregoing document was electronically filed with the Clerk of the Court using the ECF system which will send notification to all ECF participants.

s/Julie A. Beck

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